

January 20, 2016

Homelessness and Poverty Committee of the Los Angeles City Council
 The Honorable Marqueece Harris-Dawson, Co-Chair
 The Honorable Jose Huizar, Co-Chair
 The Honorable Mike Bonin
 The Honorable Gilbert Cedillo
 The Honorable Curren D. Price, Jr.

RE: Comprehensive Homeless Strategy

Dear Sirs:

Last week as I sat in Council Chambers, listening to your meeting, I recalled how nearly 30 years ago, your predecessors struggled with this. A quick search of the files and I found this, from Councilman Mike Woo (Council File 84-2191-S3):

Resolution - Homelessness is a continuing problem in Los Angeles, the state, and the nation; THEREFORE BE IT RESOLVED that in order to focus attention on the problem and offer all of the citizens of Los Angeles the opportunity to dedicate and rededicate themselves to the elimination of homelessness in society, the Los Angeles City Council proclaims the Week of April 13, 1986 through April 19, 1986 as Homeless Week

Thirty years ago.

Since then, the Council has considered and passed numerous motions to increase affordable housing development, address street encampments and many other aspects of this continuing tragedy.

I read through the latest strategy with great interest, because I edited Bring LA Home, the last attempt at a comprehensive plan to end homelessness in Los Angeles City and County. And over the last 29 years, I have facilitated and participated in countless hours of planning meetings, initially as a homeless services representative, and as LAHSA's Director of Policy and Planning from 1997 to 2007, and now again as the director of a comprehensive homeless services agency. Many of the recommendations in the current strategy are the same, sound recommendations from years past.

So, how will this time be different? What will you and your colleagues do to ensure a different outcome?

The fact that the City and County have linked strategies is very promising and should be commended. However, at this juncture, it is important to look for any potential fatal flaws that could hinder your progress.

General Concerns

First, the most important element under the City's control – housing production – does not get addressed until the 8th chapter. Perhaps one of the most important

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statements in the strategy is this: "One primary factor is a localized planning process where housing projects are subject to discretionary approvals and appeals, where local neighborhood opposition prevents new construction." This calls to mind what a planner told us during the Bring LA Home Housing Focus Group. He said his greatest frustration was to see affordable housing goals go unmet because it was "death by a thousand cuts." Project after project, shaving off units to satisfy neighborhood concerns added up to chronic shortfalls in affordable housing production. Because housing development takes years to complete, how will you build a standard value for all Councilmembers, now and into the future, to ensure these goals are met?

In short, these strategies must transcend your term in office.

A second concern I have is the clearly ideological bent to some of the sections of the document, in particular the tortured discussion of emergency and bridge housing and the defense of the Coordinated Entry System.

Finally, the Comprehensive Strategy glosses over the significant role nonprofit organizations have played as innovators and leaders in methods to address and end homelessness in Los Angeles. The narrative reflects a lack of understanding of both the history and current activities of many nonprofit homeless services organizations serving homeless people in Los Angeles.

Specific Concerns by Section

2. Demographics

This section does not talk about projected population changes that could affect the homeless numbers. What is happening with the City's aging population? What about foster youth? How many people are at risk?

2.1 Point-in-time Count. This is important for measuring trends over time. But it is the number for one-day. In the past, the LAHSA annual estimates came in over 200,000 people homeless in the course of a year. Not all will need homeless services or housing, but planning must take into consideration this ebb and flow of people into homelessness.

2.2 Functional Zero is a product of the campaign to end homelessness. When it became clear that ending homelessness does not mean people are not becoming homeless, this new term emerged. Why can't we just say we want our communities to have the capacity to help anyone in need so that they do not have to live on the streets? We need more affirming language to describe this important goal.

2.8 Citywide Homelessness Services Map. Given that homeless people will travel across City borders to use services in adjacent areas, it is important to keep in mind the role of agencies that support the City in its mission to end homelessness by serving Los Angeles City homeless residents. Use of HMIS might help discern whether this relationship results in more residents from Los Angeles obtaining assistance outside the City, or whether agencies in Los Angeles bear the expense of serving homeless people who come into Los Angeles for help.

2.16 County Findings for Demographics

2.16.1 A2- Discharge Planning Guidelines. Because Ascencia is located adjacent to the City of Los Angeles, which exacts penalties for patient dumping, we typically receive one inappropriate

discharge per week. These are homeless patients discharged from psychiatric facilities as well as from hospitals. We think this points to the efficacy of the City ordinance, and hope that similar measures can be implemented countywide. That said, the fines do not necessarily change the behavior of these institutions or the resources they will dedicate to solving the problem. We would like to be of more service, if we had the funding to operate an appropriate facility.

3. No Wrong Door

This idea is a good one, but is premised on having a homeless delivery system that can accept these referrals from any department at any time.

From 2006-2008, we had three full-time outreach workers, including evenings and weekends. We stopped this because of funding cuts and a lack of places to refer people to during those hours.

Despite these cuts in hours, Ascencia has strong working relationships with Police, Fire, Parks and Libraries in Glendale and Burbank and we have begun to cultivate those relationships in Northeast Los Angeles. We find that it is the personal trusting relationship between line staff that makes this system work.

4. Coordinated Entry System.

This is an area where Ascencia is very well-versed. Owing to the way in which CES has been implemented, Ascencia, an agency with 17 full-time employees, is part of **three** Coordinated Entry Systems. We are the lead for the Glendale Continuum of Care, we have a co-located housing navigator from LA Family Housing and are part of the SPA 2 CES, and we are part of the SPA 4 NELA CES.

In the first five months of implementation, we spent 244 hours of staff time in meetings to coordinate efforts.

General Concerns

1. Reliance on SPA boundaries. This is outdated, and does not reflect the way in which homeless services have evolved in the City and County of Los Angeles. By not taking into consideration a long-standing Access Center in Glendale as the potential central point for the area from Burbank to the 110 Freeway, the CES system has promoted fragmentation and competition, and for us, extraordinary inefficiency.
2. The boundaries are meant to be administratively convenient but do not promote localized response for homeless people. SPA 2 is enormous – (2 million people, nearly 1,000 square miles). To centralize services to that degree is very hard for clients. It also makes it difficult to engage local communities because the geography covered is so broad. SPA 4 NELA (Northeast LA) is a good example of how a more localized approach can work. By forcing a lead/subcontractor relationship among nonprofit agencies, the funders have imposed a layer of bureaucracy on the nonprofit sector.
3. The “one per SPA” rule funding is a way to manage a funding pool that is simply not enough to generate results on a scale that would be evident to the public. The system gravitates to the larger providers, with even less funding percolating down to the

subsidiary agencies in the system. The recommendations rightly seek to mitigate this, but it does not address the fundamental problem of using SPA boundaries.

4. Before investing more resources in the administration of CES, the City and County should ensure that the housing placement flow is what it needs to be. The entire section on CES offers ways to dig deeper (and adding to costs) by implementing a system that is inherently limited because there is not enough housing to move people off the streets. Due to a shortage of affordable housing units (noted in 4.8) providers are facing significant delays in housing placement, which is also backing up this system.

4.11 CES Case Managers Need

The problem is not simply that the SPA leads do not have enough case managers. The increases in case managers needs to be more geographically dispersed within SPAs. As written, this strategy would continue to intensify the system in the lead areas and threaten to diminish it in underserved areas. Do the neighborhoods around these lead agencies want to see this type of growth? This is not good for our clients and it is not good for the idea of a community-based response to homelessness.

4.13 No Single Standard for Case Management

Yes, there should be case management standards, but supporting strategy 4E is very troubling. None of the government agencies named to lead the creation of standards actually have the breadth of engagement that homeless services agencies have. We serve some clients for years – because that is what permanent supportive housing requires.

Whatever it Takes

In 1989, I completed the first in-depth survey of homeless shelters in Los Angeles County for LA Homeless Health Care. In that study we found shelter managers had widely varied views of what constituted case management and that variation continues to this day. Some of us now refer to what we do as a “whatever it takes” approach. Because the response is specifically tailored to each person or family and their unique circumstances, this means program supervisors must invest a considerable amount of trust in the judgement of the case manager. Thus, if there is going to be a standard it must factor in the unique qualities of a tenacious and savvy case manager who can inspire trust and cooperation. This is not necessarily reflected in advance degrees. Moreover, if City and County departments are to set up standards for case managers, they need to also study the hiring practices of successful nonprofit agencies.

4.21 Best Practices

- Strength of existing system: The system long pre-dates CES and there are relationships not captured by the CES rubric. The 10th Decile Project is one example.
- Common Providers: Disagree, if this means sticking to “1 per SPA”. As it is, the aggressive roll-out of CES and Family Solutions Center did not take into consideration other Continua of Care (Pasadena, Glendale and Long Beach). We now instruct families who are homeless in Glendale to NOT call 2-1-1 because they will be sent to LA Family Housing, in Van Nuys, and not Ascencia, which is in their own city. Successful implementation of any strategy should promote smaller scale services in more communities.

- **Common Funders: At what point can we agree that our methods work and that success is more a matter of management than systems change?** 98% of our Shelter Plus Care clients have remained housed. We know how to move chronically homeless people to housing and keep them there. What we need is a reliable source of funding. Too often, we have to shoe-horn our work to fit the criteria of funders, and operate on time frames that are not ideal. In some cases, we simply by-pass funding opportunities because the parameters are not feasible. We are eternally grateful to the funders of general operating expenses as our public (and some private) funding becomes increasingly restricted.

4.22 County Strategies

Strategy 4A, CES Coordination. To be truly Countywide and Citywide (As Glendale's CoC services hundreds of Los Angeles residents each year) LAHSA coordination of CES should also be coordinated with the three other CoC systems (Pasadena, Glendale, Long Beach).

4.D CES Discharge Data Tracking and Planning

Our outreach case managers are challenged to track clients when they are arrested. It would be really helpful if an HMIS case file could be noted or flagged when a homeless client is incarcerated, with a case number so the case manager can track where the person is.

5. Governance

For Governance to work, there has to be clear expectations for the agency's role as leader. Without a vision and strategic plan to guide it, LAHSA risks skirting important but sensitive issues about its role. This is a shame because LAHSA represents the second largest Continuum of Care System in the country, in a region with 17 members in Congress!

As Planning Manager and then Director of Policy and Planning, I served under three Executive Directors at LAHSA. Here are some of my observations:

- There was not an articulated, shared understanding of what the Commission should be or do.
- There was no job description for a LAHSA Commissioner.
- Despite having a strategic plan, the Commission became diverted by crises.
- The Commission needed a strong Executive Director to provide leadership and did not have it. I know at least two felt the need to manage the politics of the Commission and this also weakened their ability to lead.
- Commissioners had varying levels of engagement with the elected official who made their appointment, so the capacity to leverage influence or shape policy was limited.
- Without a planning champion on the Commission, critical planning shifted to being reactive, serving what HUD requires, but not necessarily what the Los Angeles region needed.

Without clear governance, LAHSA's potential to be a national leader on homeless policy is severely weakened. This is particularly crucial as the provisions of the HEARTH Act have been implemented.

5.8 Legislation

The local office of the Federal Reserve Board is also a potential ally in convening dialogue regarding homelessness. In 2007 I had been in talks with the Fed about convenings, but then left LAHSA. However in 2015, the Fed, still interested in homelessness, and the EPA, City and County agencies, and homeless services providers gathered for a discussion about how the L.A. River Revitalization plan affects homeless people living along the river.

6. Facilities

6.7.2 Multi-Service Centers/6E Homeless Navigation Centers

This is a very important recommendation. However, because of the investment in the facilities, I strongly recommend the return to calling them Access Centers. Many people do not want to be identified going to a “homeless center”, and if we are to succeed at moving everyone off the street, the facilities can integrate as more generalized service centers.

The narrative mentions in passing that Glendale has a multi-purpose center. Since it has served Los Angeles residents since its inception, I would like to give you a little more background. In 1996, the City of Glendale organized a multi-agency service center that convened several nonprofit organizations to provide street outreach, medical clinic, on-site psychiatrist, a team of case managers (each with a different area of specialization – substance abuse recovery, mental health, veterans services, and employment), and an on-site 40 bed shelter for families and individuals. Ascencia assumed management of the programs in 2006 and in 2013 moved the operations to a larger building that we now own on Tyburn Street. We welcome visitors and would be happy to arrange for a tour.

Key facts about Ascencia’s Tyburn Facility:

- 11,500 square feet
- Located in an industrial/commercial/residential/mixed use zone near the San Fernando Road corridor, adjacent to City of LA.
- Commercial kitchen; Volunteers buy, cook and serve dinner nightly and many breakfasts
- Wi-Fi and computers for client use
- Companion animal friendly (currently have one cat and two dogs)
- Showers for outreach clients downstairs and shelter residents upstairs
- On-site laundry
- On-site 40 bed shelter for families with children, single adults, and couples. Adults must pass a background check and drug test; entry is primarily behavior-driven.
- 1200 people served annually.
- Ongoing case management support to 80 households in permanent housing.

The presence of children attracts most of our volunteers. We have very strong community support which includes donations of cash and goods such as hygiene kits, food, and furnishings.

We are exploring ways to expand a day center and year-round shelter for chronically homeless adults who we are trying to move to housing.

Given that community support is so important to siting controversial projects, having a smaller scale facility with a range of services reduces the impact on a given neighborhood and provides the level of support many chronically homeless people need to return to housing. The scale of the project and programs is not intimidating to potential volunteers. Invariably, people who visit for the first time say something to the effect of, "It's much better than what I expected."

To the extent many people who are chronically homeless are so because they cannot manage mainstream systems of care and large bureaucracies, smaller scale projects provide a level of support and engagement they need to get and remain housed.

7. Housing

7.1 Shelter Types and Strategy

Few things have become more tortured than the quest to find the most effective and efficient form of interim housing – and giving it a name.

Because of a nearly dogmatic adherence to [harm reduction] housing first strategy, we are losing fundamental resources that have been the mainstay of keeping families and individuals safe while they figure out their next steps, or get the help they need to return to housing.

Here are two key things to keep in mind when considering short-term housing options:

1. Families need shelter beds that, at a minimum, connect the family to on-site counseling and the children to tutoring and nearby case management focused on housing placement. Shelters need to be properly funded and geographically dispersed.
2. Winter Shelter is extremely labor intensive and costly. It is very difficult to find quality staff for the season and it is certainly not funded for enough staff to carry out the needed case management.

Recommendation: Research the cost of smaller scale, year-round low demand programs for adults. We used to call them safe havens and drop-in centers, but they appear to have fallen from favor.

7.5.1 Housing Strategy Costs

The annual rate shown for emergency shelter seems very high. At \$18,250, that works out to \$50 per night, more than twice the rate LAHSA pays for winter shelter. Also, the goal is to move people out of shelter in less than a year, so one could argue a higher short-time cost would be an acceptable cost to factor into the process of moving people out of homelessness.

Recommendation: Agree on a number of year-round interim housing beds and set a budget for it.

There has never been a firm goal for how many shelter beds would be acceptable to have. Certainly we do not want to fall into the trap New York is experiencing, but we should be able to commit to something. In doing so, and in providing a level of predictability, shelter operators can move from a position of crisis to looking for ways to further augment programs and improve housing placement rates.

Other notes: vouchers can be challenging to use. Funding for nonprofits to staff the housing staff would be critical. Ascencia uses master leasing for its scattered site permanent supportive housing programs. This does work, but we are continually challenged to find new landlords.

Strategy 7a: Shelter System personnel for Bridge Housing conversion. Will this include only LAHSA –funded shelter programs, or the entire shelter system? Will it include shelters that serve Los Angeles residents but are outside the City?

Recommendation: The premise for this strategy is disturbing and the opening phrase of the description should be removed:

“Although the emergency shelter model increases a homeless individual’s dependency...”

If people become dependent on the shelter system, it is because they do not have another option, or cannot see their way out. Whoever suggested the system creates this dependency has not spent enough time with shelter workers.

It is still not entirely clear why there is so much effort being made to reframe emergency shelter as bridge housing. Why can’t there just be an updated profile of what is expected from emergency shelter? If this is because HUD is driving policy, then LAHSA missed a critical opportunity to question it.

7C Expand Adaptive Reuse

Recommendation: Please be sure there is sufficient funding for supportive services in these buildings. The strategy brief does not mention it.

7F Linkage Fee Nexus Study

Recommendation: Consider a fee attached to homes selling for \$2 million or more.

7L Micro Units

This was discussed by LA City planning as early as 2007. It would be great to see it integrated into the Comprehensive Homeless Strategy, particularly as developers have already found a way to market such units as “luxury” housing.

7M Reform Site Plan Review

In 2003, the American Planning Association released a policy guide on homelessness.
<https://www.planning.org/policy/guides/adopted/homelessness.htm>

Though it may be dated, the core principles apply. Too often, city planners are not aware of these guidelines.

10 Budget

Just as the City funds the Police and Fire Departments to respond to crises, it should consider the funding of homeless services, and the management infrastructure needed to plan and measure results, as an ongoing element of the City budget. There is an impulse to put a time limit on these funding initiatives, but the reality is that there will always be some level of need to respond to these crisis because there is nothing in the history of services, or even in this plan, that suggests

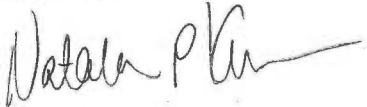
there were be a perfect ability to prevent homelessness. So, if we understand that part of the human condition is to experience crisis, and that in a city this size, there will be people who need help outside their networks of families and friends, then having a crisis response will be the answer.

Conclusion

This is an issue about community. The residents of Los Angeles want to live in neighborhoods where they feel safe. Parents want to know that their college graduate children can afford an apartment. Employers don't want their administrative assistants and clerks to commute long distances because housing is cheaper in the hinterland. These strategies must be part of a larger shift that honestly assesses housing need and makes housing affordability a reality. To the extent the County needs your support in citing service facilities, such as emergency units for mental health services, and critical supports that will mitigate entry into homelessness, you need to be at the forefront of making those projects work, too.

I know how hard the staff and their colleagues worked on the strategies, but this document seems to need your permission to be bolder. So make it more than being about ending homelessness. Make it about creating communities within a City in which no one claims the sidewalk as home.

Sincerely,



Natalie Profant Komuro
Executive Director

cc: City Clerk